

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SYDELLE GOLDWURM,

*

Plaintiff,

*

v.

*

AMERICAN REALTY CAPITAL
TRUST, INC., et al.,

*

Civil Action No. 12-cv-03516 JKB

*

Defendants.

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STIPULATION AND CONSENT MOTION TO EXTEND TIME

Plaintiff, Sydelle Goldwurm, and Defendants, American Realty Capital Trust, Inc., Nicholas S. Schorsch, William M. Kahane, Leslie D. Michelson, Robert H. Burns, William G. Stanley, Realty Income Corporation and Tau Acquisition, LLC, jointly move this Court pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 105(9), for a 2-day extension of time for (1) Plaintiff to respond to Defendants' Motion to Stay Proceedings, and (2) Defendants to respond to the Motion of Plaintiff for Expedited Discovery, and state as follows:

1. On December 12, 2012, Plaintiff served the Motion of Plaintiff for Expedited Discovery. *See* ECF No. 7.

2. On December 13, 2012, Defendants served Defendants' Motion to Stay Proceedings. *See* ECF No. 9.

3. Plaintiff's and Defendants' responses to these motions are currently due on January 2, 2013.

4. Due to the intervening holidays and the press of other cases, both Plaintiff and Defendants require additional time to complete their respective responses.

5. Plaintiff and Defendants jointly request that this Court extend the date for both Plaintiff and Defendants to file their respective responses by 2 business days to January 4, 2013.

WHEREFORE, Plaintiff and Defendants request that this Court enter an order extending the deadline for Plaintiff to respond to Defendants' Motion to Stay Proceedings to January 4, 2013 and extending the deadline for Defendants to respond to Motion of Plaintiff for Expedited Discovery to January 4, 2013, and granting such other and further relief as this Court deems just, equitable and proper.

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